

AO 91 (Rev. 11/11) Criminal Complaint

Officer:

AUSA: Susan Fairchild

Craig Hunter

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Aaron Gamaliel GAMEZ-HERNANDEZ

Case No. 25-mj-30257

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 28, 2025 in the county of Macomb in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

8 U.S.C. 1326(a)

*Offense Description*

Unlawful Re-Entry Following Removal from the United States

This criminal complaint is based on these facts:

On or about March 28, 2025, in the Eastern District of Michigan, Southern Division, Aaron Gamaliel GAMEZ-HERNANDEZ, an alien from Mexico, was found in the United States after having been denied admission, excluded, deported, and removed there from on or about May 3, 2016, and not having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☒ Continued on the attached sheet.


*Complainant's signature*

Craig Hunter, Deportation Officer

*Printed name and title*

Sworn to before me and signed in my presence  
 and/or by reliable electronic means.

Date: April 24, 2025City and state: Detroit, MI

*Judge's signature*

Anthony P. Patti, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Craig Hunter, declare the following under penalty of perjury:

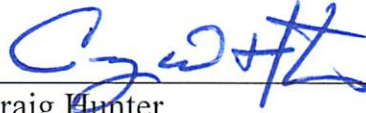
1. I am a Deportation Officer (DO), with the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) Enforcement Removal Operations (ERO). I have been employed by ICE since January of 2022 and have been a Federal Law Enforcement Officer since March of 2012. I am currently assigned as a DO in the Detroit Field Office. I have a total of three years training and experience in the enforcement of the immigration and naturalization laws of the United States. As part of my duties, I am required to identify, locate, apprehend, and remove illegal aliens who are in violation of the Immigration and Nationality Act (INA). I also investigate criminal immigration violations of the United States Code.
2. The information set forth below is for the limited purpose of establishing probable cause. Therefore, this affidavit does not necessarily contain all the information collected during my investigation. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers and record checks of law enforcement databases. I have also reviewed relevant immigration records and system automated data relating to Aaron Gamaliel GAMEZ-HERNANDEZ, a/k/a Raul GAMAS-HERNANDEZ, which reveal the following:
3. GAMEZ-HERNANDEZ is a thirty-nine-year-old citizen and native of Mexico who last entered the United States on an unknown date in June of 2016, at or near Hidalgo, Texas, without inspection by the U.S. Department of Homeland Security.
4. GAMEZ-HERNANDEZ first entered the United States on an unknown date, at an unknown location, without inspection by the U.S. Department of Homeland Security.
5. On or about May 19, 2003, GAMEZ-HERNANDEZ was encountered by the U.S Border Patrol in Mobile, Alabama and was granted a Voluntary Return to Mexico.

6. On or about May 03, 2010, GAMEZ-HERNANDEZ was encountered by the U.S. Border Patrol in Marysville, MI and processed for a Notice to Appear before an Immigration Judge.
7. On or about May 10, 2010, GAMEZ-HERNANDEZ was granted Voluntary Departure by an Immigration Judge valid until June 10, 2010.
8. On or about May 14, 2010, GAMEZ-HERNANDEZ departed the United States via Delta Flight 5641 from Detroit, MI to Monterrey, Mexico. GAMEZ-HERNANDEZ was confirmed to be on board the plane.
9. On or about December 22, 2010, GAMEZ-HERNANDEZ was convicted in the 42-2 District Court in New Baltimore, MI, for the offense of Misdemeanor Domestic Violence. According to the police report, GAMEZ-HERNANDEZ pulled the victim's hair and choked her. The victim had bruising and red marks on her neck. GAMEZ-HERNANDEZ was sentenced to 24 days in jail.
10. On or about December 27, 2010, GAMEZ-HERNANDEZ was encountered by Detroit ICE ERO after being released from the Macomb County Jail and was offered a stipulated removal, which he accepted.
11. On or about January 5, 2011, an Immigration Judge signed the stipulated removal.
12. On or about January 11, 2011, GAMEZ-HERNANDEZ was removed from the United States to Mexico via Laredo, TX.
13. On or about April 15, 2016, GAMEZ-HERNANDEZ was encountered by the U.S. Border Patrol in Chesterfield, MI and processed as a reinstatement of prior removal order of removal and he was detained.
14. On or about May 03, 2016, GAMEZ-HERNANDEZ was removed from the United States to Mexico via Laredo, TX.
15. On or about March 28, 2025, Detroit ICE ERO was conducting surveillance on GAMEZ-HERNANDEZ, who was a targeted alien with an approved Field Operation Worksheet. ICE ERO Officers observed one male subject matching the description of GAMEZ-HERNANDEZ enter a vehicle near GAMEZ-HERNANDEZ's last known address. The vehicle left the address,

and the ICE ERO Officers initiated a vehicle stop on the vehicle near 27255 23 Mile Rd. Chesterfield, MI 48051. ICE ERO Officers approached the vehicle, identified themselves, and made contact with the driver, later identified as Aaron GAMEZ-HERNANDEZ. GAMEZ-HERNANDEZ freely admitted that he had previously been removed from the United States.

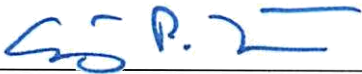
16. On or about March 28, 2025, fingerprint checks confirmed a positive match for Aaron Gamaliel GAMEZ-HERNANDEZ, DOB XX/XX/1985, AXXX XXX 166, an alien previously removed from the United States.
17. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any non-citizen entering or attempting to enter the United States, or any non-citizen present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of noncitizens.
18. A review of immigration records (A #XXX XXX 166) for GAMEZ-HERNANDEZ and queries in U.S. Department of Homeland Security databases reveal that no record exists of GAMEZ-HERNANDEZ obtaining permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States following his removal from the United States on or about May 03, 2016.
19. Based on the above information, I believe there is probable cause to conclude that GAMEZ-HERNANDEZ, is an alien who is present in the United States after deportation or removal, without the express permission from the Attorney General of the United States or from the Secretary of the

Department of Homeland Security in violation of Title 8, United States Code, Section 1326(a).



Craig Hunter  
Deportation Officer  
U.S. Immigration and Customs Enforcement  
333 Mount Elliott  
Detroit, MI 48207

Subscribed and sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable Anthony P. Patti  
United States Magistrate Judge

Date: April 24, 2025